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ORIGINAL

14 Attorneys for Plaintiff Jorge A. Mejia, appearing on behalf
15 of himself and all others similarly situated

16 **UNITED STATES DISTRICT COURT**

17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

18 JORGE A. MEJIA, an individual,) Case No. 2:15-cv-00890-GHK-JC
19 appearing on behalf of himself and)
20 all others similarly situated,)
21 Plaintiff,)
22 vs.)
23 DHL EXPRESS (USA), INC., an)
24 Ohio corporation; and DOES 1-25,)
Defendants.)

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NOTICE OF MOTION AND MOTION

TO DEFENDANT AND TO ITS ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on June 20, 2016, at 9:30 a.m., or as soon thereafter as counsel may be heard by the above-entitled Court, located at 255 E. Temple Street, Los Angeles, California, in the Courtroom of the Honorable George H. King, Plaintiff Jorge A. Mejia ("Plaintiff") will and hereby does move, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for an order granting preliminary approval to the proposed class action settlement in this case entitled Stipulation and Agreement of Compromise, Settlement and Release ("Settlement Agreement" or "Settlement"), including:

- (1) preliminarily approving of the Settlement as being fair, reasonable and adequate for the class ("Class");
- (2) provisionally certifying the Class under Rule 23 of the Federal Rule of Civil Procedure for settlement purposes only;
- (3) approving the form, manner and content of the notice of settlement ("Class Notice") to be disseminated to the Class;
- (4) appointing Plaintiff as class representative ("Class Representative");
- (5) appointing Gregg A. Farley of the Law Offices of Gregg A. Farley and Sahag Majarian, II, of the Law Offices of Sahag Majarian as counsel for the Class ("Class Counsel"); and
- (6) setting the date and time of the final approval hearing ("Fairness Hearing").

This motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declarations of Gregg A. Farley, Sahag Majarian and Plaintiff, the proposed Order Granting Preliminary Approval of Class Action Settlement, the pleadings and papers on

1 file herein and upon such other matters as may be presented to the Court at the
2 time of the hearing.

3 This motion is made following the conference of counsel pursuant to
4 L.R. 7-3 which took place on April 26, 2016.

5 DATED: May 23, 2016

LAW OFFICES OF GREGG A. FARLEY

6 By: Gregg A. Farley

7 Gregg A. Farley

8 Attorneys for Plaintiff Jorge A. Mejia,
9 appearing on behalf of himself and all others
10 similarly situated

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